

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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AFFIDAVIT OF JOHN F. ROONEY, III IN SUPPORT OF GLOBAL UNDervalued
SECURITIES MASTER FUND'S CONSOLIDATED OPPOSITION TO COMPETING
MOTIONS FOR APPOINTMENT AS LEAD PLAINTIFF

INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated,)	Civil Action No. 04-CV-10308-DPW
)	<u>CLASS ACTION</u>
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., et al.,)	
)	
Defendants.)	
)	
<hr/> PETER KALTMAN, On Behalf of Himself and All Others Similarly Situated,)	Civil Action No. 04-CV-10309-DPW
)	<u>CLASS ACTION</u>
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., et al.,)	
)	
Defendants.)	
)	
<hr/> SAMANTHA DEN, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 04-CV-10310-DPW
)	<u>CLASS ACTION</u>
)	
Plaintiff,)	
)	
vs.)	
)	
SONUS NETWORKS, INC., et al.,)	
)	
Defendants.)	
)	

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RICHARD CURTIS, Individually and On) Civil Action No. 04-CV-10314-MLW
Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

RONALD KASSOVER, On Behalf of the) Civil Action No. 04-CV-10329-DPW
Ronald Kassover IRA and All Others Similarly)
Situated,) CLASS ACTION
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

STEVE L. BAKER, Individually and On) Civil Action No. 04-CV-10333-DPW
Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

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MICHAEL KAFFEE, Individually and On) Civil Action No. 04-CV-10345-DPW
Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

HAIMING HU, Individually and On Behalf of) Civil Action No. 04-CV-10346-DPW
All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

CHARLES STARBUCK, Individually and On) Civil Action No. 04-CV-10362-DPW
Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

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SAMUEL HO, Individually and On Behalf of) Civil Action No. 04-CV-10363-DPW
All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

JEFFREY C. RODRIGUES, Individually and) Civil Action No. 04-CV-10364-DPW
On Behalf of All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

ROBERT CONTE and MARK RESPLER,) Civil Action No. 04-CV-10382-DPW
Themselves and On Behalf of All Others)
Similarly Situated,) CLASS ACTION
Plaintiffs,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

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WHEATON ELECTRICAL SERVICES) Civil Action No. 04-CV-10383-DPW
RETIREMENT 401K PROFIT SHARING)
PLAN, On Behalf of Itself and All Others)
Similarly Situated,)
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
BRIAN CLARK, Individually and On Behalf) Civil Action No. 04-CV-10454-DPW
of All Others Similarly Situated,)
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
SHEILA BROWNELL, Individually and On) Civil Action No. 04-CV-10597-DPW
Behalf of All Others Similarly Situated,)
Plaintiff,)
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

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SAVERIO PUGLIESE, On Behalf of Himself) Civil Action No. 04-CV-10612-DPW
and All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
DAVID V. NOCITO, On Behalf of Himself) Civil Action No. 04-CV-10623-DPW
and All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)
JONATHAN A. ZULAUF, On Behalf of) Civil Action No. 04-CV-10714-DPW
Himself and All Others Similarly Situated,)
Plaintiff,) CLASS ACTION
vs.)
SONUS NETWORKS, INC., et al.,)
Defendants.)

I, John F. Rooney, III, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Massachusetts. I am a member of the law firm of Melick, Porter & Shea, LLP, proposed Liaison Counsel for plaintiff in the above-entitled action. I make this Affidavit in support of Global Undervalued Securities Master Fund's Consolidated Opposition to Competing Motions for Appointment as Lead Plaintiff. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Notice of Withdrawal of Motion by the Jiang Group for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel, filed April 26, 2004;

Exhibit B: Notice of Withdrawal of Motion by Saverio Pugliese for Consolidation, Appointment as Lead Plaintiff, and for Approval of Choice of Lead Counsel, filed April 22, 2004;

Exhibit C: *Pierce v. Americredit Corp., et al.*, No. 4:03-CV-026-Y, Order (N.D. Tex. May 19, 2003);

Exhibit D: *Gradwell v. Pre-Paid, Legal Services, Inc., et al.*, No. CIV-01-182-C, Order (W.D. Okla. May 15, 2001);

Exhibit E: Brian Brus, *Plaintiff Drops Out of Pre-Paid Lawsuit Biggest Investor Sees No Merit in Continuing with Appeals*, Daily Oklahoman, Aug. 16, 2002; and

Exhibit F: *Weisz v. Calpine Corp., et al.*, No. C 02-1200 SBA, Order (N. D. Cal. Aug. 19, 2002).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 26th day of April, 2004, at Boston, Massachusetts.

/s/ John F. Rooney, III
JOHN F. ROONEY, III

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail on 4/26/04 /s/ John F. Rooney, III
